

**Commonwealth of Kentucky  
Division for Air Quality**

**PERMIT APPLICATION SUMMARY FORM**

Completed by:  
Frough Shewani P.E.

GENERAL INFORMATION:

Name: TG Automotive Sealing Kentucky, LLC.  
Address: 501 Frank Yost Lane  
Hopkinsville, KY 42240  
Date application received: March 15, 2005  
SIC/Source description: 3714 /Motors Vehicle parts & Accessories  
AFS (10-digit) Plant ID: 21-047-00108  
AI #: 4417  
Activity Number: APE20050003  
Permit number: F-05-019

APPLICATION TYPE/PERMIT ACTIVITY:

|  |  |
|--|--|
| <input checked="" type="checkbox"/> Initial issuance | <input type="checkbox"/> General permit                    |
| <input type="checkbox"/> Permit modification         | <input checked="" type="checkbox"/> Conditional major      |
| __Administrative                                     | <input type="checkbox"/> Title V                           |
| __Minor  | <input type="checkbox"/> Synthetic minor                   |
| __Significant  | <input type="checkbox"/> Operating                         |
| <input type="checkbox"/> Permit renewal              | <input checked="" type="checkbox"/> Construction/operating |

COMPLIANCE SUMMARY:

|   |   |
|---|---|
| <input type="checkbox"/> Source is out of compliance                | <input type="checkbox"/> Compliance schedule included |
| <input checked="" type="checkbox"/> Compliance certification signed |   |

APPLICABLE REQUIREMENTS LIST:

|  |   |   |
|--|---|---|
| <input type="checkbox"/> NSR                   | <input type="checkbox"/> NSPS   | <input checked="" type="checkbox"/> SIP |
| <input type="checkbox"/> PSD                   | <input type="checkbox"/> NESHAPS  | <input type="checkbox"/> Other          |
| <input type="checkbox"/> Netted out of PSD/NSR | <input type="checkbox"/> Not a major modification per 401 KAR 51:017, 1(23)(b) or 51:052 1(14)(b) |   |

MISCELLANEOUS:

☐ Acid rain source  
☐ Source subject to 112(r)  
☒ Source applied for federally enforceable emissions cap  
☐ Source provided terms for alternative operating scenarios  
☐ Source subject to a MACT standard  
☐ Source requested case-by-case 112(g) or (j) determination  
☐ Application proposes new control technology  
☒ Certified by responsible official  
☒ Diagrams or drawings included  
☐ Confidential business information (CBI) submitted in application  
☐ Pollution Prevention Measures  
☐ Area is non-attainment (list pollutants):

**EMISSIONS SUMMARY:****Existing Facility**

| <b>POLLUTANT</b>                         | <b>POTENTIAL EMISSIONS (TPY)</b> | <b>ALLOWABLE EMISSION (TPY)</b> |
|--|----------------------------------|---------------------------------|
| Carbon Monoxide (CO)                     | 3.053                            | NA                              |
| Nitrogen Oxides (NO <sub>x</sub> )       | 3.63                             | NA                              |
| Sulfur Dioxide (SO <sub>2</sub> )        | 0.022                            | NA                              |
| Particulate Matter PM/PM <sub>10</sub> ) | 0.28                             | NA                              |
| VOC                                      | 94.54                            | NA                              |
| Glycol Ether                             | 0.54                             | NA                              |
| Toluene                                  | 0.57                             | NA                              |
| Xylene                                   | 0.48                             | NA                              |
| MEK                                      | 0.43                             | NA                              |
| Acetophenone                             | 0.89                             | NA                              |
| N-Hexane                                 | 2.65                             | NA                              |
| Ethylene Glycol                          | 1.44                             | NA                              |
| Ethyl Benzene                            | 0.79                             | NA                              |
| Acetophenone                             | 0.89                             | NA                              |
| O-Xylene                                 | 0.63                             | NA                              |
| Combined HAPS                            | 9.31                             | NA                              |

**New Construction :**

| <b>POLLUTANT</b>                         | <b>POTENTIAL EMISSIONS (TPY)</b> | <b>ALLOWABLE EMISSION (TPY)</b> |
|--|----------------------------------|---------------------------------|
| Carbon Monoxide (CO)                     | 1.99                             | NA                              |
| Nitrogen Oxides (NO <sub>x</sub> )       | 2.37                             | NA                              |
| Sulfur Dioxide (SO <sub>2</sub> )        | 0.014                            | NA                              |
| Particulate Matter PM/PM <sub>10</sub> ) | 0.182                            | NA                              |
| VOC                                      | 87.7                             | NA                              |
| Ethylene Glycol                          | 0.95                             | NA                              |
| Toluene                                  | 2.86                             | NA                              |
| Xylene                                   | 0.61                             | NA                              |
| N-Hexane                                 | 3.42                             | NA                              |
| Benzene                                  | 0.63                             | NA                              |
| MEK                                      | 2.46                             | NA                              |
| O-Xylene                                 | 3.05                             | NA                              |
| Acetophenone                             | 2.74                             | NA                              |
| Combined HAPS                            | 17.31                            | NA                              |

**Resulting Source Wide (including new construction):**

| POLLUTANT                                 | POTENTIAL EMISSIONS (TPY) | ALLOWABLE EMISSION (TPY) |
|---|---------------------------|--------------------------|
| Carbon Monoxide (CO)                      | 5.06                      | NA                       |
| Nitrogen Oxides (NO <sub>x</sub> )        | 6.01                      | NA                       |
| Sulfur Dioxide (SO <sub>2</sub> )         | 0.036                     | NA                       |
| Particulate Matter (PM/PM <sub>10</sub> ) | 0.4577                    | NA                       |
| VOC*                                      | 182.23                    | 90*                      |
| MEK**                                     | 2.89                      | 9.0**                    |
| Toluene**                                 | 3.43                      | 9.0**                    |
| N-Hexane**                                | 6.07                      | 9.0**                    |
| Xylene**                                  | 1.09                      | 9.0**                    |
| Acetophenone**                            | 3.63                      | 9.0**                    |
| Benzene**                                 | 0.63                      | 9.0**                    |
| O-Xylene**                                | 3.68                      | 9.0**                    |
| Glycol Ether**                            | 0.54                      | 9.0***                   |
| Ethylene Glycol**                         | 2.39                      | 9.0**                    |
| Combined HAPS***                          | 26.62                     | 22.5***                  |

\* The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

\*\* The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9 tons per rolling 12-month period.

\*\*\* The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period.

**TOXIC ANALYSIS:**

EHS Technology Group, LLC evaluated TGASK emissions as requested by the KDEP, by creating and executing a refined air quality dispersion modeling analysis. This analysis was performed to demonstrate that TGASK emissions will not pose an unacceptable risk to human health as provided in 401 KAR 63:020. This demonstrates there are no air toxic concerns under 401 KAR 63:020 (see application for detail).

**SOURCE PROCESS DESCRIPTION:**

TG Automotive Sealing Kentucky, LLC is located in Hopkinsville, Kentucky. The facility manufactures a variety of automotive sealing products. These products are used for sealing doors, trunk lids, engine hoods, window sealant products and other automotive applications.

The facility is currently operating under the authority of 401 KAR 52:070; Registration of Designated Sources. On March 15, 2005, the source applied to construct six (6) new extrusion lines. The resulting VOC/HAPS potential to emit are greater than major source thresholds. The source opted to take federally enforceable limits to preclude the applicability of Title V.